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EXHIBIT A

**THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**CHILLY DIL CONSULTING INC., a
Florida corporation,**

Plaintiff,

V.

JETPAY ISO SERVICES, LLC, a Texas limited liability company; JETPAY, LLC, a Texas limited liability company; JETPAY CORPORATION, a Delaware corporation; and TRENT R VOIGT, an individual,

Defendants.

CIVIL ACTION NO. 3:14-cv-02749-P

**DECLARATION OF EUGENE ROME IN SUPPORT OF PLAINTIFF'S OPPOSITION
TO DEFENDANTS' MOTION FOR LEAVE TO FILE SUR-REPLY IN OPPOSITION
TO PLAINTIFF'S MOTION TO COMPEL AND MOTION FOR SANCTIONS**

DECLARATION OF EUGENE ROME IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION FOR LEAVE TO FILE SUR-REPLY IN OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL AND MOTION FOR SANCTIONS

I, Eugene Rome, declare as follows:

1. I am the counsel of record for Plaintiff Chilly Dil Consulting, Inc. ("Chilly Dil"). Unless otherwise stated as based on information and belief, I have personal knowledge of the facts stated herein. If called upon to do so, I could and would testify to the truth thereof.


2. I make this Declaration in support of Chilly Dil's Opposition to Defendants' Motion for Leave to File Sur-Reply in Opposition to Chilly Dil's Motion to Compel and Motion for Sanctions.

3. On July 8, 2015, Defendants sent incomplete supplemental responses to Chilly Dil's Special Interrogatories Nos. 5 and 6. A true and correct copy of these supplemental responses is included herewith as Exhibit "B."

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Los Angeles, California.

September 1
Dated: ~~August~~, 2015



Eugene Rome

DECLARATION OF EUGENE ROME IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION FOR LEAVE TO FILE SUR-REPLY IN OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL AND MOTION FOR SANCTIONS

EXHIBIT B

Respectfully submitted,

BY: /s/ Timothy M. Dortch
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COUNSEL FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document to all counsel of record for all parties via electronic mail on the 8th day of July, 2015.

/s/ Timothy Micah Dortch
TIMOTHY MICAH DORTCH

OBJECTIONS TO INSTRUCTIONS AND DEFINITIONS

To the extent the instructions attempt to broaden the scope of discovery as permitted under the Federal Rules of Civil Procedure, Defendant objects. Defendant will not produce privileged or non-responsive portions of documents. Relevant portions of a document, including any context that is necessary to understand the relevance, will be produced.

**OBJECTIONS AND ANSWERS TO
PLAINTIFF'S SPECIAL INTERROGATORIES**

SPECIAL INTERROGATORY NO. 5:

IDENTIFY each PERSON who was involved or in any way participated in any aspect of the review, evaluation, examination or assessment of the efforts to find a processing solution for CONFIDENTIAL MERCHANT.

Answer:

Defendant objects to this Request on the basis that it is vague and ambiguous in as such it says "who was involved or in any way participated in any aspect of the review evaluation, examination or assessment of the efforts." Such a request does not adequately identify what information the Plaintiff seeks.

Notwithstanding said objection, Trent Voigt and Todd Fuller participated in the negotiations regarding finding a bank to work with the Confidential Merchant. Jeffery Beene was involved in the risk and package development for perspective banks.

SPECIAL INTERROGATORY NO. 6:

State all facts regarding the process employed by YOU to find a processing solution for the CONFIDENTIAL MERCHANT by setting forth (1) the banks contacted by YOU as part of an effort to board the CONFIDENTIAL MERCHANT (2) the PERSONS YOU spoke with regarding the CONFIDENTIAL MERCHANT (3) the matters discussed (4) the dates on which these discussions took place (5) the results of these discussions (6) the processing solution procured for CONFIDENTIAL MERCHANT (7) the specific terms of the processing solutions procured by YOU or any of the DEFENDANTS for CONFIDENTIAL MERCHANT.

Answer:

Defendant objects to this Interrogatory on the basis it is vague and ambiguous. Notwithstanding said objections, see the response below.

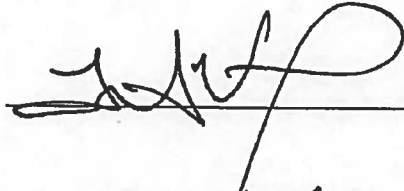
Defendant contacted Synovus Bank, Wells Fargo and Esquire Bank in an effort to obtain a bank to board the Confidential Merchant. The documents submitted and communications between the representatives of JetPay ISO and these banks are included in the Defendant's Request for Production responses. JetPay ISO was unable to procure a processing solution on behalf of the Confidential Merchant due to determinations by the US Banks to not board the Confidential Merchant. Ultimately, JetPay Solutions, LTD, a

UK company, was able to procure a processing solution on behalf of the Confidential Merchant through an EU Bank that was willing to board the Confidential Merchant.

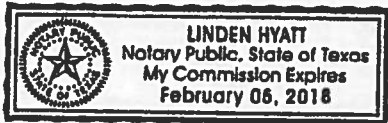
STATE OF Texas §
COUNTY OF Dallas §

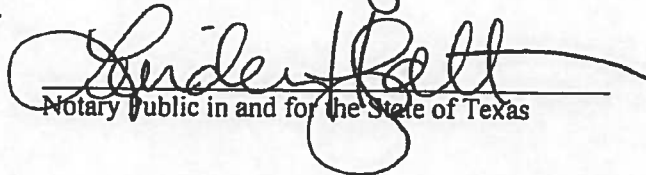
VERIFICATION

BEFORE ME, the undersigned Notary Public, on this day personally appeared Trent Veigt CEO of JetPay ISO Services, LLC who after having been by me duly cautioned and sworn did state to me upon his/her oath that he/she is a duly authorized agent for JetPay ISO Services, LLC, Defendant in this action, and that he/she has read the above, Amended Responses to Plaintiff's Special Interrogatories, and that every statement, including the interrogatories therein, contained in the interrogatories is within his/her personal knowledge and is true and correct.



SUBSCRIBED AND SWORN to on this 1st day of July, 2015, to certify which, witness my hand and official seal.




Notary Public in and for the State of Texas

My commission expires:

02/05/2018

CERTIFICATE OF SERVICE

This is to certify that on September 1, 2015, the foregoing was served upon counsel of record in accordance with the Federal Rules of Civil Procedure as set forth below by U.S. Mail or electronic filing.

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